

EXHIBIT “A”

Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

NOVEMBER 2023**02215**

E-Filing Number: 2311044833

PLAINTIFF'S NAME MITZIE CLARKE		DEFENDANT'S NAME STADIUM CASINO RE, LLC, ALIAS: C/O CORPORATION SERVICE COMPANY	
PLAINTIFF'S ADDRESS 22 HAWKINS COURT UNIT 1 WATERBURY CT 06704		DEFENDANT'S ADDRESS 251 LITTLE FALLS DRIVE WILMINGTON DE 19808	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PRO PROTHY NOV 21 2023 C. SMITH	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>MITZIE CLARKE</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY MARC F. GREENFIELD		ADDRESS TWO PENN CENTER PLAZA 1500 JFK BOULEVARD SUITE 200 PHILADELPHIA PA 19102	
PHONE NUMBER (215) 985-2424	FAX NUMBER (215) 545-6117		
SUPREME COURT IDENTIFICATION NO. 62081		E-MAIL ADDRESS efile@injuryline.com	
SIGNATURE OF FILING ATTORNEY OR PARTY MARC GREENFIELD		DATE SUBMITTED Tuesday, November 21, 2023, 08:07 am	

COMPLAINT IN PERSONAL INJURY
2S PREMISES LIABILITY

1. Plaintiff, Mitzie Clarke, is a citizen and resident of the State of Connecticut, residing at the address listed in the caption of this Complaint.

2. Defendant, Stadium Casino RE, LLC d/b/a Live! Casino & Hotel Philadelphia, is a business entity doing business in the Commonwealth of Pennsylvania with an address listed in the caption of this complaint, and which at all times material hereto was the owner, operator, maintainer, possessor, lessor, lessee and/or otherwise legally responsible for the care, control and or safety of the premises located at or near 900 Packer Avenue, Philadelphia, PA 19148 (hereinafter referred to as “subject premises”).

3. At all times material hereto defendant, Stadium Casino RE, LLC d/b/a Live! Casino & Hotel Philadelphia, was acting individually, jointly and/or by and through defendant’s agents, servants, franchisees, workmen and/or employees for the maintenance, repair, care and control of the subject premises.

4. On or about July 16, 2022, plaintiff, Mitzie Clarke, was an invitee, licensee and/or otherwise legally on defendant’s premises, when, as a result of the negligence and/or carelessness of the defendant, the plaintiff slipped and fell as the result of a wet floor surface while entering the women’s lavatory of the subject premises.

5. As a result of this accident, the plaintiff suffered severe and permanent bodily injury as more fully set forth at length below.

COUNT I
Mitzie Clarke v. Stadium Casino RE, LLC d/b/a Live! Casino & Hotel Philadelphia
Personal Injury

6. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

7. The negligence and/or carelessness of defendant consisted of the following:
- a. Failure to properly design, construct, maintain, and/or repair the subject premises, floors, hallways, pathways, aisles and/or walkways over which invitees, licensees and/or others are likely to travel rendering the subject premises unsafe;
 - b. Failure to properly monitor, test, inspect or clean the subject premises, floors, hallways, pathways, aisles and/or walkways to see if there were dangerous or defective conditions to those legally on the subject premises;
 - c. Failure to provide sufficient warning as to the reasonably foreseeable defects and dangerous nature of the subject premises, floors, hallways, pathways, aisles and/or walkways to such invitees, licensees and/or others legally on the subject premises;
 - d. Failure to barricade and/or block-off the defective and/or dangerous area of the subject premises, floors, hallways, pathways, aisles and/or walkways;
 - e. Failure to reasonably inspect, maintain and/or otherwise exercise due and reasonable care under the circumstances in view of the foreseeable dangers, accidents and/or injuries that could occur as a result of the conditions on the subject premises, floors, hallways, pathways, aisles and/or walkways;
 - f. Failure to comply with all building codes, county and city laws, ordinances and regulations pertaining to the design, construction, and maintenance of the aforementioned subject premises;
 - g. Failing to exercise the proper care, custody and control over the aforesaid subject premises;

- h. Failure to inspect, maintain and/or repair known and/or unknown defects;
and,
- i. Failing to prevent and/or remove a dangerous condition derived, originated
or had its source the aforesaid subject premises;

8. As a direct result of the negligent and/or careless conduct of defendant, the plaintiff suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: partial tear of the supraspinatus of the left shoulder, C4-5, C5-6, C6-7, cervical disc herniations with impingements, L5-S1 lumbar disc herniation, L4-5 lumbar disc bulging, cervical sprain and strain, lumbar sprain and strain, left shoulder sprain and strain, post traumatic headaches, and any other ills, injuries, all to plaintiff's great loss and detriment.

9. As a result of these injuries, all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time.

10. As an additional result of the carelessness and/or negligence of defendant, plaintiff has suffered emotional injuries along with the physical injuries suffered.

11. As a further result of the injuries sustained, the plaintiff has, is presently, and may in the future undergo a great loss of earnings and/or earning capacity, all to the further loss and detriment of the plaintiff.

12. Furthermore, in addition to all the injuries and losses suffered, the plaintiff has incurred or will incur medical, rehabilitative and other related expenses in the amount equal to and/or in excess of any applicable health insurance coverage for which plaintiff has not been reimbursed and upon which the plaintiff makes a claim for payment in the present action.

WHEREFORE, plaintiff demands judgment in plaintiff's favor and against defendant in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable costs and any other relief the court deems necessary.

**SPEAR, GREENFIELD,
RICHMAN, WEITZ & TAGGART P.C.**



BY: MARC F. GREENFIELD, ESQUIRE

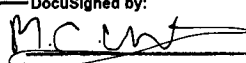
INTERROGATORIES, REQUESTS FOR PRODUCTION OF DOCUMENTS, SUPPLEMENTAL REQUESTS AND REQUEST FOR ADMISSIONS ARE SERVED ATTACHED TO PLAINTIFF'S COMPLAINT AT THE TIME SERVICE OF ORIGINAL PROCESS IS AND/OR WAS EFFECTUATED.

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VERIFICATION

The undersigned, plaintiff in this action, verifies that the within pleading is based upon information furnished to counsel, which has been gathered by counsel in the preparation of this lawsuit. The language of the attached pleading is that of counsel and not of signor. Signor verifies that the within pleading, as prepared by counsel, is true and correct to the best of signor's knowledge, information and belief. To the extent that the contents of the within pleading are that of counsel, signor has relied upon counsel in taking this verification.

This verification is made subject to the penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsification to authorities.

DocuSigned by:

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